



**United States Environmental Protection Agency  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912**

March 16, 2021

Mr. Matthew Calacone  
Global Operations, Environment, Health & Safety  
General Electric Company  
1 Plastics Avenue  
Pittsfield, MA 01201

via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's February 19, 2021 submittal titled  
On-Plant Consolidation Areas and Groundwater Management Area 4, GMA 4  
Long-Term Monitoring Program/OPCA Post-Closure Groundwater Monitoring  
Event Evaluation Report for Fall 2020, GE-Pittsfield/Housatonic River Site

Dear Mr. Calacone:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the GMA 4 Long-Term Monitoring Program/OPCA Post-Closure Groundwater Monitoring Event Evaluation Report for Fall 2020 (the "Report"). The Report is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the Report subject to the following conditions.

1. Section 3.2, well H78B-15: The presence of the hard well bottom at an elevation higher than the understood construction details of the well paired with an apparent lack of sedimentation should prompt an evaluation of the well construction details by GE. This well was installed in 1996 and the 1997 Phase 2 report gives construction details that would yield a base of well elevation of 993.80 feet AMSL, which matches the constructed total depth reported by GE in 2020. GE has since informed EPA that following a December 18, 2002 survey, the ground surface elevation, and thus the resulting screen elevation that had been measured from ground surface, was corrected in the Fall 2002 report. The revised base of screen was 994.30 feet AMSL. However, subsequent reports reverted back to the apparently erroneous elevations on the 1996 boring log. The construction information reported in Fall 2002 better aligns with the current measured total depth (994.46 feet AMSL) and, if correct, would explain the consistent shallower than expected total depth measurements over the years, even after sediment removal attempts. Prior to submittal of the Spring 2021 report, GE shall

review or collect necessary data to propose any necessary construction information corrections for this well in that report.

2. Section 3.2, well OPCA-MW-3R: GE states that the well was re-surveyed as a result of replacing the curb box. Table 3 shows that the measuring point elevation from the Spring 2020 report of 1015.26 has been changed (lowered) to 1014.95 in the Fall 2020 report, while all the other well feature elevations have remained the same. GE has since clarified that the resurvey was completed due to the riser being cut down to accommodate a higher load rating curb box that required more clearance than the original curb box. In future reports, Table A-1 will specify if such well modifications are made when curb boxes are replaced, rather than only specifying a resurvey is necessary.

EPA reserves all of its rights under the Decree, including but not limited to, the right to perform and/or require additional sampling, or response actions, if necessary, to meet the requirements of the Consent Decree. If you have any questions, please contact me at (617) 918-1721.

Sincerely,



Richard Fisher  
GE Facility Project Manager

cc:

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